

Exhibit “1”

1 STEVEN S. NIMOY, ESQ. (SBN 172310)
2 **SOLTMAN, LEVITT, FLAHERTY & WATTLES LLP**
3 2535 Townsgate Road, Suite 307
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5 Attorneys for Defendants, ELECTRONIC DOCUMENT
PROCESSING, INC.; TANAYA V. SULCER

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

11 JEFFREY HENRY PAULL, }
12 Plaintiff, }
13 vs. }
14 ELECTRONIC DOCUMENT }
PROCESSING, INC. D/B/A EDP }
LEGAL SERVICES, INC. A California }
Corporation; TANAYA V. SULCER, }
individually and in her official }
capacity; and DOES 1 through 10, }
inclusive }
18 Defendants. }
19

CASE NO: CV12-06194-EJD-PSG
OFFER OF JUDGMENT
[F.R.C.P RULE 68]

Complaint served: January 14, 2013

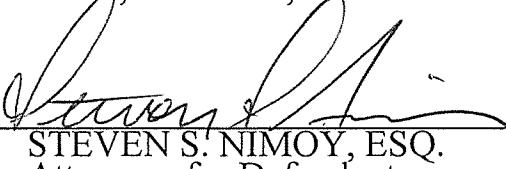
20 TO THE PLAINTIFF HEREIN AND TO HIS ATTORNEYS OF RECORD:

21 Defendants ELECTRONIC DOCUMENT PROCESSING, INC. dba EDP LEGAL
22 SERVICES, INC. and TANAYA V. SULCER, hereby offer to have judgment in favor of
23 Plaintiff and against Defendants in the above-referenced action on the First Claim for Relief,
24 jointly and severally, in the amount of Two Thousand Five Hundred and 00/100 dollars
25 (\$2,500.00) plus costs and reasonable attorney's fees in an amount to be determined by
26 agreement between the parties herein, or by motion for reasonable attorney's fees to be filed
27 by counsel for the Plaintiff and determined by the Court. All other claims to be dismissed with
28 prejudice by the Court.

1 Defendants make this offer of judgment for the purposes specified in Rule 68. This
2 offer is not to be construed as an admission that Defendants are liable to Plaintiff in this action
3 or otherwise, or that Plaintiff has suffered any damages.
4

5 DATED: August 12, 2013

SOLTMAN, LEVITT, FLAHERTY & WATTLES
6 LLP

7 By: 

8 STEVEN S. NIMOY, ESQ.
9 Attorneys for Defendants,
ELECTRONIC DOCUMENT PROCESSING,
INC. and TANAYA V. SULCER

10 NOTICE OF ACCEPTANCE

11 NOTICE IS HEREBY GIVEN that plaintiff, JEFFREY HENRY PAULL, accepts the offer
12 made by defendants ELECTRONIC DOCUMENT PROCESSING, INC. dba EDP LEGAL
13 SERVICES, INC. and TANAYA V. SULCER, to have judgment entered in favor of Plaintiff and
14 against Defendants in this matter on the First Claim for Relief, jointly and severally, for the sum of Two
15 Thousand Five Hundred and 00/100 Dollars (\$2,500.00) plus costs and reasonable attorney's fees in
16 an amount to be determined by agreement between the parties herein, or by motion for
17 reasonable attorney's fees to be filed by counsel for the Plaintiff and determined by the
18 Court. All other claims to be dismissed with prejudice by the Court..
19

Dated: August ___, 2013

20 By: _____
21

22 Attorneys for Plaintiff
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1 PROOF OF SERVICE
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STATE OF CALIFORNIA, COUNTY OF VENTURA

I am employed in the County of Ventura, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 2535 Townsgate Road, Suite 307, Westlake Village, California 91361.

On August 12, 2013, I served the foregoing document(s) described as **OFFER OF JUDGMENT** on the interested parties in this action by placing a true and correct copy thereof, enclosed in sealed envelopes, and caused to be delivered to the addressees, as follows:

Fred W. Schwinn, Esq.
CONSUMER LAW CENTER, INC.
12 South First Street, Suite 1014
San Jose, CA 95113

10 XX (MAIL)

By placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth above. I placed each such envelope for collection and mailing following ordinary business practices. I am readily familiar with the business' practice for collection and processing of correspondence for mailing. Under that practice, the document(s) would be deposited with the United States Postal Service on the same day, with first class postage thereon fully prepaid at Westlake Village, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

15 — (CERTIFIED MAIL - RETURN RECEIPT REQUESTED)

I placed such envelope(s) with first-class postage thereon, fully prepaid, including the additional postage needed for Certified Mail, Return Receipt Requested, and with the proper United States Post Office forms for Certified Mail, Return Receipt Requested affixed thereon, in the United States mail at 2535 Townsgate Road, Suite 307, Westlake Village, California 91361.

16 — (NORCO OVERNITE)

I placed such envelope(s), with fees fully prepaid for next business day delivery, in a Norco Overnite box located in Westlake Village, California, that is regularly maintained by Norco Overnite and has a daily weekday pick-up schedule.

17 — (FEDERAL EXPRESS)

I placed such envelope(s), with fees fully prepaid for next day delivery, in a Federal Express box located in Westlake Village, California that is regularly maintained by Federal Express and has a daily pick-up schedule.

18 — (U.S. Postal Service - EXPRESS MAIL)

I caused such envelope(s) to be delivered, with fees fully prepaid for next business day delivery, to an Express Mail box located at the U.S. Post Office in Thousand Oaks, California, that is regularly maintained by the U.S. Postal Service and has a daily weekday pick-up schedule.

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PROOF OF SERVICE

1 (VIA FACSIMILE)

I caused such documents to be faxed from a facsimile transmission machine whose telephone number is (805) 497-1147 to the above-identified recipient and fax telephone number as shown. The above-described transmission was reported as complete without error by a transmission report issued by the facsimile transmission machine upon which the said transmission was made immediately following the transmission. CCP §1010.6.

(VIA E-MAIL)

Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused such documents to be e-mailed to each of the aforementioned electronic mail addresses. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. C.C.P. §1010.6.

8 || (PERSONAL SERVICE)

I caused such documents to be personally delivered to the addressee at the referenced address shown above.

10 (VIA WWW.ONELEGAL.COM)

I electronically served the above document(s) on all interested parties by submitting an electronic version of the documents(s) to One Legal, LLC, through the user interface at www.onelegal.com, and selecting all parties on the service list which One Legal maintains for this case. I uploaded the document(s) at approximately p.m.

13 STATE

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

15 || XX FEDERAL

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

17 EXECUTED this 12th day of August, 2013, at Westlake Village, California.

Linda Abernethy
Linda Abernethy